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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**AGENDA REGARDING MATTERS
SCHEDULED FOR HEARING ON
AUGUST 17, 2023 AT 10:30 A.M.**

Cash Cloud, Inc., dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”), by and through its undersigned counsel, Fox Rothschild LLP, hereby files this *Agenda Regarding Matters Scheduled for Hearing on August 17, 2023 at 10:30 a.m.*

1. *Fourteenth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a) (the “**Fourteenth Omnibus Motion to Reject**”) [ECF No. 690] - ***This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.****

Related Documents:

A. *Declaration of Daniel Ayala* [ECF No. 691].

Objections/Responses Filed:

A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934].

2. *Ninth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a)* (the “**Ninth Omnibus Motion to Reject**”) [ECF No. 675] – ***This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.***

Related Documents:

A. *Declaration of Daniel Ayala* [ECF No. 676].

Objections/Responses Filed:

A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to the *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934].

3. *Eleventh Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a)* (the “**Eleventh Omnibus Motion to Reject**”) [ECF No. 681] - ***This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.***

Related Documents:

- A. *Declaration of Daniel Ayala* [ECF No. 682].

Objections/Responses Filed:

- A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to the *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934].

4. *Twelfth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a)* (the “**Twelfth Omnibus Motion to Reject**”) [ECF No. 684] - ***This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.***

Related Documents:

- A. *Declaration of Daniel Ayala* [ECF No. 685].

Objections/Responses Filed:

- A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to the *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934].

5. *Fifteenth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a)* (the “**Fifteenth Omnibus Motion to Reject**”) [ECF No. 693] - ***This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.***

Related Documents:

- A. *Declaration of Daniel Ayala* [ECF No. 694].

Objections/Responses Filed:

- A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934].

6. *Sixteenth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a)* (the “**Sixteenth Omnibus Motion to Reject**”) [ECF No. 696] – ***This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.***

Related Documents:

- A. *Declaration of Daniel Ayala* [ECF No. 697].

Objections/Responses Filed:

- A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to the *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934].

7. *Seventeenth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases Pursuant to 11 U.S.C. § 365(a)* (the “**Seventeenth Omnibus Motion to Reject**”) [ECF No. 700] – *This motion was continued solely with respect to Brookfield. This motion was heard and granted with respect to all other parties. Will be continued to August 29, 2023 at 9:30 a.m.*

Related Documents:

- A. *Declaration of Daniel Ayala* [ECF No. 701].

Objections/Responses Filed:

- A. *Limited Objection* [ECF No. 842] filed by Brookfield Retail Properties, Inc. Motion was continued to July 27, 2023 solely with respect to Brookfield pursuant to the *Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 848]; and *Order* thereon [ECF No. 851]. Motion was further continued to **August 17, 2023** solely with respect to Brookfield pursuant to *Second Stipulation With Brookfield Landlords To Continue Hearing On Multiple Omnibus Motions For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) For Brookfield Landlords Only* [ECF Nos. 675, 681, 684, 690, 693, 696, and 700] [ECF No. 933]; and *Order* thereon [ECF No. 934];
- B. *Limited Response to Debtor's Amended Seventeenth Omnibus Motion Seeking Rejection of Individual Digital Cash Machine Contracts Under Master Agreements Dated November 20, 2020 with United Natural Foods, Inc.* [ECF No. 811];
- C. *Reply To Limited Response Filed By United Natural Foods, Inc. To Seventeenth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(a)* [ECF No. 840]; and
- D. *Notice of Withdrawal of Limited Response to Debtors Amended Seventeenth Omnibus Motion Seeking Rejection of Individual Digital Cash Machine Contracts Under Master Agreement Dated November 20, 2020 with United Natural Foods, Inc.* [ECF No. 868].

8. *Enigma Securities Limited's Application for Allowance and Payment Regarding Administrative Claim Order* [ECF No. 873] (“**Enigma Administrative Claim Motion**”) – **Status Hearing Only.**

Related Documents:

- A. *Stipulation Regarding Scheduling of Dates in Connection with Enigma's Administrative Expense Claim* [Docket No. 873], *Committee's Standing Motion* [Docket No. 925], and *Debtor's Surcharge Motion* [Docket No. 926] [ECF No. 1026], and *Order* thereon [ECF No. 1056].

Objections/Responses Filed:

- A. *Debtor's Objection to "Application for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. §§ 361, 362, 363, 364, 503, 507, and Bankruptcy Rules 3012 and 8002" [ECF No. 873] [ECF No. 987]; and*
- i. *Declaration of Daniel Ayala [ECF No. 988].*

9. *Opposition to Approval of Stipulation Granting Derivative Standing to the Official Committee of Unsecured Creditors with Respect to Certain Actions [ECF No. 1029] ("**McAlary Opposition to Derivative Standing Stipulation**")*.

Related Documents:

- A. *Order Approving Stipulation And Granting Ex Parte Application For Order Shortening Time To Hear Opposition To Approval Of Stipulation Granting Derivative Standing To The Official Committee Of Unsecured Creditors With Respect To Certain Actions [ECF No. 1064].*

Objections/Responses Filed:

- A. *Response of the Official Committee of Unsecured Creditors to Opposition to Approval of Stipulation Granting Derivative Standing to the Official Committee of Unsecured Creditors with Respect to Certain Actions [ECF No. 1073];*
- B. *Request for Judicial Notice in Support of Opposition to Approval of Stipulation Granting Derivative Standing to the Official Committee of Unsecured Creditors with Respect to Certain Actions [ECF No. 1029] and Objection to Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023 [ECF No. 1061] [ECF No. 1074]; and*
- C. *Debtor's Joinder in the Response of the Official Committee of Unsecured Creditors to Opposition to Approval of Stipulation Granting Derivative Standing to the Official Committee of Unsecured Creditors with Respect to Certain Actions [ECF No. 1076].*

10. *Debtor's Disclosure Statement for Chapter 11 Plan of Reorganization Dated May 8, 2023 [ECF No. 529] ("**Disclosure Statement**") – **Unopposed**.*

Related Documents: None.Objections/Responses Filed: None.

11. *Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 996] ("**First Amended Plan**").

Related Documents:

- A. *Notice of Redline of Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 997];
- B. *Supplement To Debtor's Chapter 11 Plan Of Reorganization Dated May 8, 2023* [ECF No. 528] [ECF No. 821];
- i. *Notice of Filing of: (A) Revised Exhibit A – Creditor Trust Agreement and Declaration of Trust; and (B) Redline of Exhibit A – Creditor Trust Agreement and Declaration of Trust attached to Supplement to Debtor's Chapter 11 Plan of Reorganization Date May 8, 2023* [ECF No. 528] attached to *Debtor's Supplement to Debtor's Chapter 11 Plan of Reorganization Dated May 8, 2023* [ECF No. 528] [ECF No. 821] [ECF No. 1081]; and
- C. *Notice of Filing of Proposed Order: (A) Approving Debtor's Disclosure Statement* [ECF No. 529] *on a Final Basis; and (B) Confirming Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 996] [ECF No. 1080].

Objections/Responses Filed:

- A. *Stipulation to Continue Hearing on (I) Final Approval of Disclosure Statement* [ECF No. 529]; *and (II) Confirmation of Debtor's Chapter 11 Plan of Reorganization Dated May 8, 2023* [ECF No. 528] [ECF No. 732], and *Order thereon* [ECF No. 741];
- B. *Genesis Stipulation to Extend Deadlines* [ECF No. 828];
- C. *Stipulation to Extend Plan Objection and Voting Deadline for AVT* [ECF No. 829];
- D. *Enigma Securities Limited's Reservation of Rights with Respect to Confirmation of Plan* [ECF No. 834];
- E. *Brink's Objection to Confirmation of Plan* [ECF No. 837, as amended by ECF No. 838];
- F. *Debtor's Omnibus Reply to: (A) Objection of Brink's Incorporated to Confirmation of Debtor's Chapter 11 Plan and Reservation of Rights; and (B) Enigma Securities Limited's Reservation of Rights With Respect to Confirmation of Plan* [ECF No. 910];
- i. *Declaration of Daniel Ayala* [ECF No. 911];
- G. *Second Stipulation to Continue Hearing on (I) Final Approval of Disclosure Statement* [ECF No. 529]; *and (II) Confirmation of Debtor's Chapter 11 Plan of Reorganization Dates May 8, 2023* [ECF No. 528] [ECF No. 915]; and *Order thereon* [ECF No. 918];
- H. *McAlary Objection to Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 1061];
- I. *Cole Kepro International, LLC Limited to Confirmation of Plan* [ECF No. 1070];

- J. *Declaration Of: Angela Tsai on Behalf of Stretto Regarding Solicitations of Votes and Tabulation of Ballots Accepting and Rejecting the Debtor's Chapter 11 Plan of Reorganization Dated May 8, 2023 and Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 1077];
- K. *Memorandum of Law in Support of: (A) Final Approval of Disclosure Statement* [ECF No. 529]; *and (B) Confirmation of Debtor's First Amended Chapter 11 Plan of Reorganization Dated August 1, 2023* [ECF No. 996] [ECF No. 1078]; and
- i. *Declaration of Tanner James* [ECF No. 1079].

Pursuant to Administrative Order 2020-14, all hearings are currently being held telephonically absent further order of the Court. Parties are permitted to appear telephonically by dialing (669) 254-5252 and entering meeting ID 161 062 2560 and entering access code or passcode 029066#. Copies of all pleadings are available at <https://cases.stretto.com/CashCloud> (the “Case Website”).

DATED this 16th day of August 2023.

FOX ROTHSCHILD LLP

By: /s/Brett Axelrod
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